Exhibit 6

1

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

```
*  *  *  *  *  *  *  *  *  *  *  *  *  *  *  *  *  *
STEPHEN BECKMAN,                                *
        Plaintiff                              *
                                               *
VS.                                            *   CIVIL ACTION
                                               *   NO. 03-12567-NG
BULL HN INFORMATION SYSTEMS,                   *
INC.,                                          *
        Defendant                              *
*  *  *  *  *  *  *  *  *  *  *  *  *  *  *     *
```

DEPOSITION OF JOSEPH DESOUSA, called by the
Defendant, taken pursuant to the applicable provisions of
the Federal Rules of Civil Procedure, before Ruth E.
Hulke, Certified Shorthand Reporter No. 114893 and Notary
Public for the Commonwealth of Massachusetts, at Wilmer,
Cutler, Pickering, Hale and Dorr, LLP, 60 State Street,
Boston, Massachusetts, on Monday, April 11, 2005,
commencing at 2:00 p.m.

APPEARANCES:

    JOAN A. LUKEY and KELLY S. BLACK-HOLMES, ESQS., of
Wilmer, Cutler, Pickering, Hale and Dorr, LLP, 60 State
Street, Boston, Massachusetts, 02109, on behalf of the
Defendant.

    NANCY L. EDGREN, ESQ., of Barron & Stadfeld, P.C.,
100 Cambridge Street, Suite 1310, Boston, Massachusetts,
02114, on behalf of the Plaintiff.

Leavitt Reporting, Inc.

1   go into the plants and conduct a physical inventory.

2   That's a once a year process. I worked with him a few

3   times on physical inventories.

4   Q.   Were these occasions when you were working in

5   different facilities?

6   A.   Right. At the time in its heyday they had a

7   facility in Lawrence, Lowell and Brighton. As part of

8   the integrity of the balance sheet, you have to take a

9   physical inventory. We would take the inventory under

10   the auspices of the external logs, so I worked with Steve

11   or vice-versa.

12   Q.   At some point in time did you become aware that

13   layoffs were happening at Bull?

14   A.   Oh, yes.

15   Q.   When did you first become aware that layoffs

16   were occurring?

17   A.   The past, my last ten years there you could see

18   them coming.

19   Q.   From '86 forward?

20   A.   Oh, sure. You could see the industry was

21   changing, consolidating, and, you know, I knew for the

22   past ten years layoffs were coming all over the place,

23   yeah.

1   Q.   Did you become aware at some point that Bull's

2 revenues and profits were declining?

3   A.   Oh, yes. Because I'm in part of that financial

4 reporting group. We see some of the results.

5   Q.   How did you first learn that?

6   A.   We would hear presentations from higher

7 management. They told us how the division was doing.

8   Q.   Which division?

9   A.   We were Honeywell, we originally started out as

10 Honeywell Datamatic Division, a separate division in the

11 computer industry. This was 1965. Then they started

12 buying out a number of small computer companies in the

13 sixties and seventies, and they bought out the GE

14 computer business. So we were the computer division of

15 Honeywell. So we knew based on quarterly or annual

16 presentations how the computer division was doing. We

17 knew based on revenues and volumes. Then we finally sold

18 our piece to Honeywell, to Bull, who was the French

19 outfit.

20   The genesis of it all is when GE got into the

21 computer business, Bull owned fifteen percent of GE. In

22 the seventies, Honeywell bought GE's business out, and

23 what came with that was Bull's fifteen percent. That

1   unit going for a quarter million dollars. That is how

2   powerful it is today. So that just killed the industry.

3   Q.   When did you become aware that the

4   manufacturing division at Bull was going to have

5   significant layoffs?

6   A.   Well, because we could see the, we knew in our

7   capacity as analysts and our planners there, we could see

8   the volumes that manufacturing had to produce, and the

9   volumes, the manufacturing volumes are constantly

10   declining. Okay? We could see this year to year to

11   year. You have to realize, hey, we can't sustain this

12   type of operation, we can't go from three shifts down to

13   two shifts and down to one shift. And the investment for

14   that industry was really expensive. Machines cost

15   $500,000 just to operate a printer circuit line.

16   We knew the volumes, Steve and I. Steve would tell

17   me what the volumes were. We knew from quarter to, at

18   least, quarter to quarter how the volumes were

19   decreasing, decreasing, decreasing.

20   Q.   The volumes of what?

21   A.   Manufacturing volumes. Which, in turn, would

22   translate into later on sales volumes. So we knew the

23   product, manufacturing product was decreasing which, in